

Linda Krop, SBN 118773
ENVIRONMENTAL DEFENSE CENTER
906 Garden Street
Santa Barbara, CA 93101
Tel: (805) 963-1622; Fax: (805) 962-3152
lkrop@edcnet.org

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

LEAGUE FOR COASTAL PROTECTION, <u>et al.</u> ,)	Case No. C 05-0991 CW
)	
Plaintiffs,)	STIPULATION
)	REQUESTING ORDER
v.)	ENLARGING TIME FOR
)	ATTORNEY FEES
GALE NORTON, Secretary of the Interior, <u>et al.</u> ,)	
)	
Defendants.)	
)	

On August 31, 2005, this Court entered judgment for plaintiffs in the above-captioned case. Federal Rule of Civil Procedure 54(d)(2)(B) and Civil Local Rule 54-6 require motions for attorney fees to be filed within 14 days of entry of judgment, unless such time is enlarged by court order. By stipulation, plaintiffs and defendants hereby respectfully request this Court to

**STIPULATION REQUESTING ORDER ENLARGING TIME FOR ATTORNEY FEES –
C 05-0991 CW**

enlarge the time for filing a motion for attorney fees to either: (1) November 30, 2005, if defendants do not appeal this Court's August 31 order; or (2) within 30 days of final judgment entered following the exhaustion of all opportunities to appeal this Court's order, if defendants choose to appeal. These new deadlines would accord with the deadline for filing a motion for attorney fees established by the Equal Access to Justice Act at 28 U.S.C. § 2412(d)(1)(B), (d)(2)(G).

Dated: September 8, 2005

/s Andrew P. Caputo

Andrew P. Caputo, SBN 203655

David E. Newman, SBN 233263

NATURAL RESOURCES DEFENSE COUNCIL

/s Linda Krop

Linda Krop, SBN 118773

ENVIRONMENTAL DEFENSE CENTER

Attorneys for Plaintiffs

Dated: September 8, 2005

/s David B. Glazer

David B. Glazer

Senior Attorney

Natural Resources Section

Environment and Natural Resources Division

United States Department of Justice

301 Howard Street, Suite 1050

San Francisco, California 94105

Telephone: (415) 744-6491

Facsimile: (415) 744-6476

e-mail: david.glazer@usdoj.gov

Attorney for Defendant United States Minerals
Management Service

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 9/13/05

/s/ CLAUDIA WILKEN

JUDGE CLAUDIA WILKEN

UNITED STATES DISTRICT COURT

**STIPULATION REQUESTING ORDER ENLARGING TIME FOR ATTORNEY FEES –
C 05-0991 CW**